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Attorney for Defendants  
Eleven23 Marketing, LLC and  
Armen Gharabegian

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

## CORT BUSINESS SERVICES CORPORATION,

Plaintiff,

ELEVEN23 MARKETING, LLC;  
ARMEN GHARABEGIAN; LOUNGE  
22, LLC; and ETHOS DESIGN, LLC,

## Defendants.

Case No. 2:15-cv-02454-GMN-PAL

**STIPULATION AND ORDER  
TO EXTEND TIME TO  
RESPOND TO COMPLAINT**

## (First Request)

Pursuant to Local Rules 6-1(a), 6-2 and 7-1, and Federal Rule of Civil Procedure 6(b), Defendants Armen Gharabegian and Eleven23 Marketing, LLC (d/b/a Lounge 22, d/b/a Ethos Design), erroneously sued as Lounge 22, LLC and Ethos Design, LLC (collectively, the "Defendants") and Plaintiff CORT Business Services Corporation ("CORT" or "Plaintiff"), by and through their respective counsel of record, hereby stipulate as follows:

WHEREAS, on November 25, 2015, Defendants filed a civil complaint against CORT in the State of California for the County of Los Angeles, styled as *Eleven23 Marketing, LLC and Armen Gharabegian v. CORT Business Services Corporation*, Case No. EC064472;

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1        WHEREAS, on January 8, 2016, CORT filed a Notice of Removal of the  
2 civil complaint styled as *Eleven23 Marketing, LLC and Armen Gharabegian v.*  
3 *CORT Business Services Corporation*, Case No. EC064472, seeking removal of  
4 the matter to the U.S. District Court for the Central District of California  
5 pursuant to 28 U.S.C. § 1441(a), based on federal question and diversity  
6 jurisdiction;

7        WHEREAS, on January 15, 2016, CORT filed a Motion to Dismiss or,  
8 In the Alternative, to Transfer Case to the District of Nevada in the matter  
9 before the U.S. District Court for the Central District of California, Case No.  
10 2:16-CV-00167;

11       WHEREAS, CORT's Motion to Dismiss or, In the Alternative, to  
12 Transfer Case to the District of Nevada is scheduled to be heard in the U.S.  
13 District Court for the Central District of California on February 22, 2016;

14       WHEREAS, Defendants Eleven23, Lounge 22, Ethos Design and  
15 Armen Gharabegian were served on different dates between December 28,  
16 2015 and January 18, 2016;

17       WHEREAS, Defendants have requested, and CORT has consented to,  
18 an extension of the time for Defendants to respond to CORT's Complaint to  
19 February 26, 2016;

20       WHEREAS, Rule 6(b) requires the Court to approve an extension of  
21 time for Defendants to file an answer, and therefore the Parties collectively  
22 request the Court approve the agreement, as set forth below:

23              a.       This is the Parties' first stipulation for an enlargement of  
24 time to respond to the Complaint;

25              b.       The Parties stipulate and agree that the deadline for  
26 Defendants to file an answer or otherwise respond to CORT's Complaint  
27 shall be extended to February 26, 2016; and

28

1           c. This stipulation is not made for purposes of delay.  
2

3           IT IS SO STIPULATED.

4           Dated this 20th day of January, 2016.

5           DUANE MORRIS LLP

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6           By: /s/ Alice Snedeker

7           Alice Snedeker (Pro Hac Vice)  
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15  
16  
17          Attorneys for Plaintiff  
18          CORT Business Services Corporation

19           By: /s/ Rosa Solis-Rainey

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24          Attorney for Defendants  
25          Eleven23 Marketing, LLC and  
26          Armen Gharabegian

27           ORDER

28           IT IS SO ORDERED.

29           DATED: February 1, 2016

30             
31           UNITED STATES MAGISTRATE JUDGE